Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment	)	WT Docket No. 17-79

THE CITY OF CHICAGO COMMENTS ON NOTICE OF PROPOSED RULEMAKING AND NOTICE OF INQUIRY

The City of Chicago, Illinois (the "City")[1] respectfully submits these Comments in response to the April 21, 2017 Notice of Proposed Rulemaking ("NPRM"), Notice of Inquiry ("NOI"), and Request for Comment of the Federal Communications Commission (the "Commission").[2]

Under Mayor Emanuel, the City has committed to transforming Chicago into a "Smart City" built to capitalize on the role technology can play in improving the lives of all Chicago residents. Chicago believes one key component of this transformation will be installation of a robust 5G wireless broadband network throughout the City. The City further understands that this 5G wireless network will likely utilize numerous small cell equipment installations on new or existing physical structures. The Chicago Technology Plan states directly: "The [City] will work with internal and external partners to improve the speed, availability, and affordability of broadband across the City."[3] In that spirit, the City hopes it can work with both the Commission and wireless operators to pursue commonsense solutions facilitating this deployment. At the

[1] The City of Chicago, Illinois consists of 234 square miles, 1,045,560 housing units and 2,695,598 residents.
[2] *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, PUBLIC NOTICE, WT Docket No. 17-79, Notice of Proposed Rulemaking, Notice of Inquiry, and Request for Comment, FCC 17-38 (Apr. 21, 2017) (2017 Wireless Infrastructure Notice).
[3] City of Chicago Technology Plan at 4, *available at* http://techplan.cityofchicago.org

same time, the City must ensure its residents' safety and quality of life as well as the public's interest in being fairly compensated for private use of public property.

I. RESPONSE TO NOTICE OF PROPOSED RULEMAKING AND NOTICE OF INQUIRY

A. NPRM -- "Deemed Granted" Remedy for Missing Shot Clock Deadlines

The City supports maintaining existing federal "shot clock" deadlines for action on a wireless siting application, enforceable through a legal challenge by the applicant and relying on a rebuttable presumption that the deadline is reasonable.[4] Changing this framework so that applications are instead "deemed granted" as a matter of law automatically upon reaching the shot clock deadlines completely ignores the highly fact-specific scenarios a local community acting in good faith could face in complying with the deadlines and threatens public safety as well as the ongoing operation of complex communication systems serving existing users. We write to strongly oppose "deemed granted" proposals, proposals to reconsider shot clock deadlines, and any potential proposals to apply shot clock and Spectrum Act deadlines to municipally owned proprietary property in the right-of-way.

In Chicago, wireless siting applications in the rights-of-way are reviewed and approved by the Chicago Department of Transportation ("CDOT") through authority delegated to CDOT under the Municipal Code. CDOT also manages requests to site wireless equipment on City proprietary property such as municipal light poles and traffic signals located in the rights-of-way. CDOT's Division of Infrastructure Management ("DOIM"), is tasked with managing right-of-way assets and coordinating the plans of all facility owners in the ROW, including telecommunications providers.

[4] NPRM at ¶ 5.

Chicago's rights-of-way infrastructure, located on nearly 4,000 miles of streets, especially its underground infrastructure in the Central Business District, is incredibly dense and complex, rivalled only by a few similarly dense cities in the country. This complexity is compounded by Chicago's history – much of the above infrastructure dates to the 19th or early 20th century.

Since Mayor Emanuel took office, Chicago, in partnership with the city's utilities, has been implementing the Mayor's "Building A New Chicago" infrastructure program, replacing aging water mains and sewers, systematically repaving and improving surface streets, and accommodating one of the largest natural gas main replacement programs in the country, amongst other work. To manage all of this work, CDOT established a three-stage ROW siting and work approval process. DOIM's Office of Underground Coordination ("OUC") convenes existing facility owners to determine the viability of new projects based on the location of existing infrastructure. CDOT personnel staff and coordinate OUC's work. Twenty-seven OUC members, covering almost all public and private entities (including telecommunications operators) with facilities in the ROW, participate in CDOT-convened reviews of how a proposed installation will affect existing facilities.[5] Next, DOIM's Project Coordination Office ("PCO"), utilizing a nationally recognized Google Maps platform known as dotMaps, coordinates all work and activity in the ROW to minimize resident and business disruption and maximize efficient use of both City and applicant resources. Finally, once OUC and PCO work is complete, applicants seek ROW occupancy and construction permits from the DOIM Permit Office, and equipment, wireless or otherwise, can be installed within the permit's time frame[6]

[5] OUC coordinated over 5,000 existing infrastructure reviews in 2016.
[6] The DOIM Permit Office issued over 145,000 public right of way permits for construction or other temporary occupations of the ROW in 2016.

CDOT is more than willing to review and process ROW siting requests that do not involve installation of underground facilities and such requests can be processed more quickly than a fully underground project. However, these requests are relatively rare because even above-ground equipment such as small cells usually still needs access to underground electrical power sources or underground communications networks.

The point of describing in detail Chicago's ROW facility review, coordination and approval process is to highlight the unfairness, potential safety risks, and confusion a dense, complex city like Chicago would face if subject to a Commission-imposed "deemed granted" remedy. Even despite this complexity, CDOT works hard to process applications as efficiently yet safely as possible. Of most interest for wireless deployment, CDOT estimates it is currently approving small cell equipment requests on municipal traffic and light poles within an average of about 55 days in 2017. Over two thirds of that time is estimated to occur in the OUC process, where the siting must be coordinated with existing facilities for important public safety and operational reasons. CDOT's review and approval efforts rely on technical analysis and application of facility-neutral CDOT ROW regulations to the siting request.

Despite the professional process described, *supra*, there will occasionally be projects where circumstances cause a review and approval to take longer than average. The review and coordination process is inherently iterative, making it unlikely that the City could ever eliminate the possibility of a longer approval timeline in certain cases without jeopardizing safety and the protection of existing infrastructure. While the City does not concede that the shot clock deadlines or the Spectrum Act deadline apply to siting applications or for location on municipally owned property, including light and traffic poles, the City nonetheless seeks to process all applications as quickly as possible. This is evidenced by the small cell processing

time discussed above. In the City's view, a "deemed granted" standard simply does not fit the circumstances in a complex, urban environment like Chicago. Difficult and time-consuming coordination activities could find the City "violating" a deadline and giving the applicant an installation right with uncertain implications as to public safety and coordination with other ROW users, including telecommunications operators with existing equipment in the ROW.

Chicago's wireless siting applications for locations not in the ROW, including private buildings and other real property, are reviewed and approved by the City's Department of Buildings ("DOB") and Department of Planning and Development ("DPD"). Chicago utilizes a zoning framework that encourages streamlined deployment of collocated wireless facilities on buildings throughout much of the city. In fact, collocated wireless facilities are permitted as of right in most zoning districts. For these facilities, review and approval consists of DOB structural and engineering review and these applications are usually processed within 60 days or less. In any given year, a small number of applications must proceed through more extensive review coordinated by DPD for various reasons – a structure may not meet the Municipal Code's definition of a collocation because of its dimensions or installation location, or the proposed location is in an historic district or other zoning district where installation is not as of right. For this proportionally small number of applications, review may need to follow the procedures of the Zoning Board of Appeals or the City's historic preservation ordinances. Unsurprisingly, this additional process and review can lead to longer application timelines.

As with ROW applications, the City's concern is that a "deemed granted" remedy ignores legitimate circumstances where a minority of applications take longer to review. For example, OUC review of proposals that could impact or damage sensitive facilities like natural gas mains, electric distribution lines, and sewer main can involve careful study of engineering plans and

detailed discussions with the owners of those facilities. This process varies in length and sometimes a particularly complex part of the ROW may cause it to take longer than average. However, the OUC review must prioritize public safety and provision of essential services above haste. Chicago also prides itself on the historic character and quality of its built environment and it must more carefully review certain installation proposals, whether because of their dimensions, intrusiveness, or structural complexity. The City's first priority is the safety and quality of life of its residents and businesses. In certain "hard cases" those priorities necessitate more careful siting review even

The City constantly evaluates its success in managing fair, efficient ROW and building siting review in a "reasonable period of time" for all applications submitted and that lengthier approvals are related to particular legitimate complexities, not due to arbitrariness or obstruction. Even for approvals where the City does not concede the applicability of federal deadlines, such as requests to locate on City proprietary property, the City continues to work with industry applicants on streamlining its process, as reflected by current average approval periods. Anecdotally, we are encouraged by feedback received from industry representatives, who report to the City that they are choosing to locate their equipment on City-controlled property because the City efficiently reviews and approves installations relative to other options.

Given the responsibility local governments have to ensure public safety and to offer a high quality of life responsive to community input, the Commission must avoid a blunt instrument like the "deemed granted" concept which would penalize the many cities like Chicago acting in good faith but faced with a complex built environment.

B. NPRM -- Reasonable Period of Time to Act on Applications[7]

The City's concerns regarding the NPRM's proposal on reasonable periods of time to act on applications are similar to its concerns regarding the "deemed granted" remedy. In both cases, the City does not object to the larger goal of ensuring good faith, efficient review of siting applications, with review focused on structural, safety, and quality of life standards. But in both cases, the City is concerned that nationwide, federal rules or interpretations will impact the minority of applications where legitimate City interests require longer review.

The City does not object to reasonable goals as to time periods for acting on applications. As discussed, *supra*, the City has worked to achieve efficient processing times even for applications where no federal deadline exists. But any effort to impose formal deadlines that are either too short or utilize narrowly drawn eligibility categories will inevitably sweep up the subset of cases where a "reasonable" time period to act is longer. This could be due to infrastructure complexity or legitimate safety and quality of life concerns such as structural evaluations of aging infrastructure in a location or aesthetic evaluations of a particular streetscape. The City is not convinced that additional or revised federal deadlines are needed but if the Commission does promulgate new or revised deadlines, it must build in flexibility for these "hard cases."

Any new "reasonable period of time" deadlines should accommodate those communities, such as Chicago, that have worked with industry to allow "batch" application submittals. The City does not believe that batch submittals are appropriate for many siting reviews, such as review of siting on private buildings, where each building will have unique structural characteristics. However, the City is open to other locations where batch submittals do not raise structural or other safety concerns. For example, after discussion with wireless industry

[7] NPRM at ¶¶ 17-21.

applicants, the City decided to allow, and even encourage, batch submittal of siting requests on municipal light and traffic poles. Batching does offer certain process efficiencies for both the City and applicants but it also means that the City is examining a number of proposed site locations in one "application." It would be counterproductive if cities open to solutions like batching that speed up application review were then penalized through "reasonable period of time" deadlines that aren't carefully drawn to account for concepts like batching.

C. NOI – "Prohibit or Have the Effect of Prohibiting" – Fees[8]

The City discusses at length in its 2017 Wireline Infrastructure Notice Comments[9] its views regarding the Act's preservation of local governments' right to require reasonable compensation for use and activity in the public ROW and incorporates that discussion here. The City's application and other permit review and processing fees, whether in the ROW or outside of it, are cost-based and the City is confident it could justify these fees in the context of costs incurred by the City. The City's annual fee for occupying space on a City light or traffic pole is based on a fair compensation model, as discussed, *infra*, in the context of the City's proprietary capacity. Neither the Communications Act (the "Act") itself or judicial precedent provides any support for an argument that the Act only allows cost-based fees or gives the Commission discretion to impose such a requirement – in fact, the Act's plain language contemplates reasonable compensation, a phrase, which when unmodified, is clearly broader than only reimbursement of costs.[10]

[8] NOI at ¶¶ 93-94.
[9] City of Chicago Comments (June 15, 2017), *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, PUBLIC NOTICE, WC Docket No. 17-84, Notice of Proposed Rulemaking, Notice of Inquiry, and Request for Comment, FCC 17-37 (Apr. 21, 2017) (2017 Wireline Infrastructure Notice), *as modified by 2017 Wireline Infrastructure Notice*, PUBLIC NOTICE, WC Docket No. 17-84 DA-17-473 (May 16, 2017).
[10] While Section 332(c)(7) does not directly reference compensation, Section 253(c), of course, does.

As further support for this reading of the Act, congressional legislative history on the bipartisan Barton-Stupak amendment which added Section 253(c) contains a statement by the sponsor that the amendment:

> "[E]xplicitly guarantees that cities and local governments have the right not only to control access within their city limits, but also to set the compensation for the use of that right of way. It does not let the city governments prohibit entry of telecommunications service providers for pass through or for providing service to their community …The federal government has absolutely no business telling State and local government how to price access to their local rights of way."

141 Cong. Rec. H8460-61 (remarks by Rep. Barton).

There may be some hypothetical scenario where exorbitant use or approval fees, if otherwise within the Commission's jurisdiction, satisfy Section 332(c)(7)'s "prohibit or have the effect of prohibiting" standard. We are confident, however, that Chicago's current model, as well as the approach of similar large cities across the country, is far from being that hypothetical.

In our discussion, *supra*, we described our focus on streamlining siting approvals while maintaining a safe, high-quality built environment for the City's residents. We are committed to these efficient processes but, given the high volume of applications anticipated for the foreseeable future, this enhanced review model also brings higher costs. Thus, it is imperative to holistically evaluate any attempts by the Commission to change application review deadlines, to create standards regarding use and review fees, or to rewrite the proprietary capacity doctrine. None of these concepts can be treated in isolation.

In fact, none of these concepts can even be isolated only to the telecommunications industry – as we note, *supra*, numerous other essential services also use and operate in the ROW

and likewise pay facility-neutral ROW use and review fees and street restoration costs. For example, it would be simply untenable for Chicago, in an age of tight budgets, to meet more stringent application deadlines if those are combined with new restrictions on the City's ability to be compensated for the use of its property and its costs of siting review and management. Complete adoption of all industry views discussed in this and other dockets could turn out to yield a Pyrrhic victory for wireless operators in advancing larger goals of efficient wireless broadband deployment.

Both CDOT and DOB continue to implement efficiency and process improvements that will facilitate wireless deployments. For example, as of 2017, CDOT now utilizes a dedicated project team in its Engineering Division, comprised of licensed engineers and other project professionals, solely focused on reviewing and approving requests to locate on City light and traffic poles. DOB likewise has enhanced its review capacities for the types of siting requests made by wireless operators. This attention, the City believes, has yielded results, seen by the very reasonable average approval timeframes discussed, *supra*.

As of early June 2017, more than 505 small cell or distributed antenna systems are currently deployed or are permitted and will soon by deployed on City light or traffic poles.[11] The City fully expects this number to continue to grow and is planning for an accelerated pace of deployment. It is unfair, and contrary to the Act, to require City taxpayers, who may not even be wireless operators' customers, to shoulder an unfair portion of the costs associated with such intensive deployment or to not receive fair compensation for use of assets their tax dollars financed. This is especially true given that the wireless industry is a mature, well-financed, profitable industry capable of managing such reasonable costs and compensation.

[11] Six wireless operators currently have installed small cell or DAS facilities on City poles. Approximately 300 of the installations are located on light poles with the remainder on traffic signal poles.

D. NOI – Statutory Applicability to Municipal Proprietary Capacity

The City believes the Commission appropriately analyzed this issue in its 2014 Order implementing the Spectrum Act ("2014 Order").[12] In that Order, the Commission relied on long-standing judicial precedent that recognizes circumstances where municipalities act in a regulatory capacity from those where a municipality acts in a proprietary capacity by managing assets or operating activities not unlike a private enterprise. A paradigmatic example, in the wireless siting context, of a municipal regulatory activity is review of an application to site wireless equipment on a private building or structure. Such a review implicates local governments' long-standing regulatory oversight of zoning and land-use decisions.

Likewise, the City asserts that a paradigmatic example of the municipal proprietary capacity is management of assets such as public buildings and municipally-owned light poles or traffic signals. Whether or not the asset is located in the rights of way should not be a controlling factor in an analysis of proprietary functions. Nothing in this record or in the Act would allow the Commission or a court to infer otherwise. Thus, as a matter of law, the City has the right to control access to its assets and to obtain compensation for use or occupation of the assets. These rights extend to municipal assets such as light poles and traffic signals.

Section 332(c)(7) of the Act refers to the "Preservation of Local Zoning Authority" and contains no restrictions on the use of municipal facilities. The relevant Congressional conference report states that the amendment creating new section 332(c)(7) "prevents Commission preemption of local and State land use decisions and preserves the authority of State and local governments over land use matters except in the limited circumstances set forth in the conference

[12] *Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies*, WT Docket No. 13-238, FCC 14-153, Report and Order (Oct. 21, 2014).

agreement."[13]. Furthermore, the conference committee report states that: "It is the intent of this section that bans or policies that have the effect of banning personal wireless services or facilities not be allowed and that decisions be made on a case by case basis…It is not the intent of this provision to give preferential treatment to the personal wireless service industry in the processing of requests…"[14] Nothing in this section would suggest any Commission authority over municipal light poles or other facilities; it's plain language and intent are to mandate that personal wireless systems are treated fairly and expeditiously in regard to zoning regulation and ROW access. Moreover, Section 332(c)(7)(B)(i) regarding the "Limitations" of local zoning authority refers to the "regulation" of the placement, construction and modification of personal wireless service facilities by" state and local government. The willingness of local government to enter the marketplace and allow attachments to its proprietary facilities is never at issue.

The seizure of public property is a taking beyond the normal scope of an administrative agency. In no part of the Act did Congress, including in the pole attachment provisions, contemplate the seizure of municipal facilities. In fact, Section 224(a) of the Act, its pole attachment requirements provision, states that the term "utility" does not include any person "owned by any State." The definitions in Section 224(a)(3) make it clear that any "State" includes municipal subdivisions. Thus, municipal proprietary poles are explicitly excluded from the Act's pole attachment rules.[15] As stated in the *Sprint Spectrum* case, "not all actions by state

[13] Telecommunications Act of 1996, Conference Report at 207-208.
[14] *Id.* at 208.
[15] *See, e.g.*, Bldg. & Constrc. Trades Council v. Assoc. Builders and Contractors, 507 U.S. 218, 226-27 (states which manage own property not subject to federal preemption because preemption only applies to state regulation); Omnipoint Communications v. City of Huntington Beach, 738 F.3rd 192 (intent of the Act was not to preempt decisions regarding telecommunications facilities on city park land); Sprint Spectrum L.P. v. Mills, 283 F.3rd. 404, 421 (2nd. Cir. 2002).

and local government entities…constitute regulation for such an entity, like a private person, may buy and sell or own and manage property in the marketplace."[16]

In short, Congress has directly spoken on the precise question at issue, as evidenced by both the plain language of the statute, legislative history, and existing precedent, and there can be no deference to the Commission in order to re-interpret the control of municipally-owned facilities, whether in or out of the public way.[17] Congress has stated in Section 224(a) that the pole attachment rules do not apply to municipal proprietary property by explicitly excluding them from the sweep of such provisions. There is no ambiguity here. As such, for the Commission to take the sovereign property of state and local governments, it must receive a new direction from Congress to do so.[18] If the Commission insists on proceeding to take municipal property now, this will be *ultra vires,* beyond the legal authority of the Commission, and will subject the Commission to years of litigation.

Without conceding any rights arising from its proprietary functions, the City, of course, understands that, as a public entity, its management of assets is of a different nature than that of a purely private enterprise and that the City may find significant benefit for City residents and businesses in choosing to lease its facilities to wireless providers. Instead of profit motivations driving its asset management, the City instead must balance various public policy concerns so as to best serve the interests of its residents and businesses. In the case of ROW assets like light poles and traffic signals, the City is aware of their siting value to wireless operators and customers as the operators enhance existing 4G service and plan for the new opportunities offered by 5G service. At the same time, the City must ensure that City taxpayers are fairly

[16] Sprint Spectrum, 283 F.3rd at 421.
[17] *See* Chevron U.S.A. Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984).
[18] This, of course, presumes that there would not be constitutional concerns with such a congressional action, a presumption that the City does not necessarily concede.

compensated for assets that their tax dollars helped to fund. The City must also ensure that siting on its assets occurs in an orderly, safe manner and that all operators have the ability to access sites in a non-discriminatory fashion.

In order to balance these policy considerations when siting wireless facilities on light and traffic poles, for nearly a decade the City has utilized CDOT regulations governing access, approval processes, operating rules, and compensation.[19] These regulations are a uniform and efficient means of allowing access to the City's pole assets. Their compensation structure for access is comparable to other large, dense U.S. cities and reflects fair compensation for the ability to site equipment in one of America's largest cities. The compensation structure also ensures that wireless operators responsibly use a scarce resource, light and traffic poles, and proceed with actual deployment of facilities so they can earn a return on their investment rather than hording location approvals. The City is currently engaged in a complete review of the pole regulations with a goal of modernizing any outdated provisions and ensuring that the regulations best serve wireless operators' future technological plans. Finally, while the City remains committed to the pole regulations as an efficient pole management strategy, it also remains open to discussions with operators on deployment strategies utilizing other existing City Municipal Code authorities.

Finally, the City notes that many of its light and traffic poles may have been funded through tax-exempt municipal bonds. This reality points to another practical concern raised by an attempt to deconstruct the proprietary capacity doctrine. If funded by tax exempt bonds, such poles may be subject to intricate Internal Revenue Service rules and guidance regarding the portion of the pole that can be utilized for private as opposed to public use. The City is very concerned that subjecting the poles to new Commission regulations or declaratory orders would

[19] CDOT Regulations for Use of City Light Poles, issued pursuant to Municipal Code of Chicago Chapter 10-29.

put the City in the impossible situation of choosing between violating tax-exempt bond covenants or violating a Commission directive.

E. NOI – Unreasonable Discrimination - Undergrounding

Chicago agrees with the commonsense proposition that wireless facilities must at least partially be located above ground to serve their purpose. For that reason, the City believes there must be sufficient installation capacity above ground for wireless facilities. In Chicago, that capacity is generally met through three major sources – (1) private buildings and other structures or property located outside of the ROW; (2) City-owned light poles and traffic signal poles; and (3) electric utility-owned (Commonwealth Edison Company ("ComEd")) poles.[20] The prevalence of ComEd poles varies based on location. In some outlying City neighborhoods, ComEd poles are located in nearly all types of public ROW – alleys, residential streets, and arterial streets. However, generally speaking, the City's density necessitates undergrounding of most fiber, electric distribution lines, and other conduit, especially in the City's core, central business district.

As with many of the other issues the City comments on in this Response, the City urges the Commission to be cautious in promulgating new rules or guidance that do not acknowledge significant differences in the built environment of municipalities across the country. The City does not assert that there are no circumstances where the Act's standards for "unreasonable discrimination" could be violated through undergrounding requirements. However, in dense big cities like Chicago, undergrounding is an absolute necessity and is necessary for public safety, infrastructure reliability and maintenance of the City's unique character. In every corner of the City there are multiple options for siting wireless facilities above ground and the City commits to maintaining those options. However, there is no merit to a Commission position whereby

[20] Certain of these poles are jointly owned by the electric utility and the incumbent local exchange carrier.

required, non-discriminatory, and reasonable undergrounding of electric power connections, conduit connecting small cells to a provider's network, or other similar equipment is found to violate the Act's "unreasonable discrimination" provisions.

F. All Issues – Equitable Deployment of Next-Generation Wireless Facilities

The City's Technology Plan discusses extensively the need to ensure that hugely promising new technologies such as 5G are available in a robust, affordable, easily accessible form for all Chicagoans, no matter where they live in the City. While we understand that deployment is still in early stages, we are concerned that deployment currently concentrates in the City's central business district and adjacent, often affluent neighborhoods.[21] This is likely a result of differences in customer density and capacity needs. Nonetheless, the City is closely monitoring deployment geography and places a high policy priority on avoiding a 5G "digital divide."

The City believes the Commission must explicitly discuss the important of equitable deployment in any Order issued in this docket and must ensure that any substantive changes are carefully considered regarding how they will affect this issue. The City is open to discussion with the Commission or industry on creative solutions and initiatives that can find a place of middle ground where our positions differ but could yield progress in addressing equitable deployment goals.

[21] CDOT is developing a Google platform map with geographic distribution of all small cell deployments and our initial analysis of geographic distribution derives from this effort to map current deployments.

Respectfully submitted,

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